

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re: : CHAPTER 13  
Niconnia M. Headen :  
 :  
Debtor : BANKRUPTCY NO.: 19-13636-AMC

**RESPONSE TO CERTIFICATION OF DEFAULT**

Debtor, by her attorney, Brandon J. Perloff, Esq. by way of Response to Movant's Certification of Default, respectfully represents the following:

1. Due to circumstances outside the control of the Debtor (i.e. measures in place to limit the spread of COVID 19), she has experienced an economic hardship.
2. However, the Debtor has the funds to cure any default which may have occurred.
3. The Debtor respectfully requests an opportunity to tender any payments which may be due to the Movant.

WHEREFORE, Debtor requests that a hearing be set on this matter.

Respectfully submitted,

Date: May 28, 2020

/s/ Brandon J. Perloff  
Brandon J. Perloff Esquire.  
Attorney for Debtor